REMARKS

The objection to claim 17 has been corrected.

It is respectfully submitted that there is no combination or modification of the three cited references which could reach the claimed invention.

Specifically, the claimed invention calls for (1) communicating address information about the devices in the first radio frequency network over a non-radio frequency network to a second radio frequency network and (2) making that address information about the devices in the first radio frequency network available to the devices in the second radio frequency network. Thus, we have two networks, such as piconets, which are separated and which communicate with one another over a non-radio frequency network.

The Examiner contends that Cannon teaches two separated piconets which communicate over a radio frequency, not a non-radio frequency connection. Further, the Examiner concedes that Cannon is silent as to enumerating a plurality of devices. Thus, Cannon teaches the situation of two radio frequency networks that communicate by radio frequency and do so without enabling one device of one network to communicate with any device of the other network. That is because there is no enumeration data which is shared across the connecting radio frequency network as conceded by the Examiner. This leaves one with the feeling that Cannon really does not teach anything pertinent and, at most, teaches away from the claimed invention. Namely, by concession, Cannon teaches neither of the two limitations set forth above.

The final office action suggests that this seemingly insurmountable problem can be overcome by the teaching of Tony. However, Tony does not teach two separated networks which are linked by a non-radio frequency connection. He does not teach sharing enumeration data over that non-radio frequency connection. Instead, all that Tony teaches, according to the Examiner, is two networks which have one device which is in range to both networks. Further, the Examiner contends that each master in each network sends enumeration data to slaves in its network.

Even taking all these concessions as true for purposes of argument, again, neither of the limitations taught above is set forth.

It is believed that the fundamental problem with the rejection is the argument "when considering Cannon per Tony, one of Cannon's base units would be a member of both piconets."

This statement illuminates the fundamental problem with the combination. Cannon teaches two separated piconets which communicate without providing enumeration data. Tony teaches two non-separated networks (which the Examiner contends) might share enumeration data. But neither reference or their combination teaches any way to share enumeration data between non-in range devices. That is, the combination of Tony and Cannon does not help the rejection because neither reference teaches sharing enumeration data beyond the range of a network.

This is brought home by the statement that "Tony's teaching requires that one of the two devices in the connection per Cannon would have to be a member of both piconets." But this is physically impossible. In the case of Cannon, no such thing is ever suggested. The two separated devices are part of there own separate piconets and nothing ever changes about which piconet they are in. In Tony, the only reason that one device can be a member of both piconets is that one device is in range. If the device that is common between the networks were not in range, then the two networks would not have overlapping slaves and there would be no way to communicate. In effect, the assertion of what is required begs the obviousness question. It suggests that the references do something that neither of them can do and thereby concludes that the claimed invention is obvious. Certainly, this is logically and legally impermissible.

Instead, if one of ordinary skill in the art were to combine the two references, he would say, "wait a second, Cannon teaches two separated networks but does not allow exchange of enumeration data between them." Therefore, per se, Cannon cannot be of any assistance. "Moreover, Tony teaches that if I want to exchange information between two piconets, I need to keep them in radio frequency range." Neither reference or their combination teaches any way to exchange enumeration data outside the range of the piconets. Thus, neither reference teaches any way to make the address information about devices in a first radio frequency network available to devices in the second radio frequency network.

In short, the assertion that, when considering Cannon per Tony, Tony's teaching requires that one of the two devices in the connection per Cannon would have to be a member of both piconets, is untenable. Not only is it not taught by either reference, but the requirement is non-enabled by either reference. Thus, the rejection cannot be premised on the argument that the two elements will be pushed together in some way that neither of them suggested is possible and which neither of the references taught any way to implement.

The problem with the rejection is further illuminated in the response to arguments where it is pointed out that the Applicant argues that there is no sharing of addresses across the piconets. Again, in response, the Examiner simply asserts that there must be sharing. But it does not have to be so. That is because neither reference teaches how to do such a thing and, therefore, the rejection cannot be premised on something that neither reference teaches. The suggestion that one device would be a member of both networks is made in the rejection, but never is it explained how either reference teaches doing so. Specifically, neither reference teaches making a device a member of both networks when those networks are not in radio frequency communication with one another or in range.

In the case of Tony, once the two networks are moved so that there is no common device, then there is no way to make them operation. In Cannon, the two networks are separated, but there is no sharing of enumeration data. Neither reference or their combination can teach what you do when you do not have a common device in both networks. That is the claimed feature which does not exist in the references. Stated differently, the fundamental question is how do you exchange enumeration data between two networks that have no common members. Neither Tony or Cannon has any answer to that question.

The Examiner contends that if a device were a member of both networks, then the information would be shared. Of course, if elephants had wings, they could fly. The problem is, in the postulated combination, nobody would be a member of both networks. Cannon teaches the situation where the two networks do not share members and Tony teaches the situation where sharing is premised based on being in range in two networks. Once the two networks are out of range, the combination of the two references has no solution.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

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